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May 10, 2019

VIA ECF

Honorable Lois H. Goodman, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: *In re Effexor Antitrust Litigation*
Master Docket No. 11-cv-05479 (PGS-LHG)**

Dear Judge Goodman:

This firm, together with co-counsel, represents Defendants Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and Wyeth Pharmaceuticals Company (collectively, "Wyeth"). We write, on behalf of all parties, to update the Court on the resolution of an outstanding discovery dispute.

In the parties' joint letter to the Court dated June 6, 2018 [Dkt. No. 528], Plaintiffs requested that the Court direct Wyeth to search the files of all current and former Wyeth employees that Wyeth identified in its Rule 26(a)(1) initial disclosures. [See Letter at 6, II.] At that time, Wyeth's initial disclosures listed several individuals who were not custodians for purposes of document production.

Plaintiffs have recently requested that Wyeth limit the individuals listed in its initial disclosures. After consideration of Plaintiffs' request, Wyeth served Second Amended Initial Disclosures on May 3, 2019.

Wyeth's Second Amended Initial Disclosures do not list any current or former Wyeth employees who are not document custodians, with the exception of two individuals for whom Wyeth does not have either ESI or hard copy documents. In addition, Wyeth has agreed that, if it adds individuals to its initial disclosures in the future, Wyeth will, at that time, work in good faith with Plaintiffs to agree upon reasonable parameters to search those individuals' documents. Thus, Plaintiffs' request in the June 6, 2018 letter to the Court is moot. The parties confirm that all of the disputes Plaintiffs raised regarding Wyeth's production in the June 6, 2018 letter to the Court (Sections I and II) have now been resolved.

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May 3, 2019

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As always, we thank the Court for its continued attention to this matter and are available should Your Honor or Your Honor's staff have any questions.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF)